

Exhibit 32
(Redacted)
(Previously Filed Under Seal as Dkt. 440)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY, and
ACE AMERICAN INSURANCE COMPANY

Defendants.

Case No. 16-CV-1054(WMW/DTS)

**EXPERT REPORT OF
NEIL J. ZOLTOWSKI
WITH RESPECT TO DAMAGES**

Respectfully submitted this 19th day of April, 2019



CONFIDENTIAL – ATTORNEYS’ EYES ONLY

B. Profits from Using and Distributing Blaze Advisor

111. FICO may be entitled to disgorge Defendants' profits from written premiums generated using Blaze Advisor.²²⁸ Between March 31, 2016 and March 2019, Defendants generated gross written premiums in the United States of \$28.4 billion. (See **Schedules 3.0** and **8.0**.) FICO may also be entitled to disgorge the profits from written premiums generated by certain foreign entities that used Blaze Advisor in Canada, Australia, the United Kingdom and certain other European countries between April 2013 and March 2019 of \$2.5 billion. (See **Schedules 3.0** and **9.0**.) In total, FICO may be entitled to disgorge the profits from written premiums generated using Blaze Advisor of \$30.9 billion. (See **Schedule 3.0**).

VII. ANALYSIS OF DAMAGES

112. For purposes of my damages analysis, I have assumed that Defendants Federal and ACE American are liable for the causes of action asserted by FICO and as a result of Defendants' actions, FICO has suffered economic harm, and/or Defendants have realized improper economic benefits.

A. Lost FICO Software License, Support, and Maintenance Fees

i. Nature of Defendants' License Agreements

113. The appropriate measure of FICO's lost domestic license fees for the period from March 31, 2016 (i.e., the termination date) to December 2019 (i.e., the trial ready date in this matter) is FICO's annual named-application deployment and development seat license fees for the period each Blaze Advisor application is used without FICO's licensed consent. This is the appropriate measure of loss to FICO because it reflects the value of its software for each year of unlicensed use in each unlicensed application until that use is enjoined.

²²⁸ I understand based on the Copyright Act (17 U.S.C. § 504(b)) that: "In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work." As a result, the damages presented related to copyright infringement damages reflect the dollar amounts associated with the gross written premiums through Defendants' allegedly infringing use of Blaze Advisor.

ii. Size and Development Seats for Defendants' Applications

114. [REDACTED]

Table 7: Size and Seats Required for Defendants' Applications

Application	Country		
CSI eXPRESS	U.S.	[REDACTED]	
Automated Renewal Process			
Profitability Indicator			
Decision Point			
Commercial Underwriting Workstation (CUW)			
Individual Rate Modification Application (IRMA)			
Premium Booking			
Texas Accident Prevention System (TAPS)			
CIS Claims			
Cornerstone			
EZER	U.K. & Europe		
Evolution	Canada		
Broker Site	Canada		
Evolution	Australia		
Adapt	Australia		
Adapt	U.K.		
Exari	U.K.		

iii. License, Development, Support, and Maintenance Fees

115. Based on the sizes and number of development seats required for Defendants' named applications in **Table 7** above and FICO's standard rate table, FICO has lost \$16.1 million in

²²⁹ Waid 1/16/19 Deposition at 39-40, 98, 104, 108, 110, 131; Waid Declaration at Exhibit A (FICO0000830).

²³⁰ Waid 1/16/19 Deposition at 39-40, 98, 104, 108, 110, 131; Waid Declaration at Exhibit A (FICO0000830).

SCHEDULE 6.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 6.0: Domestic Named Application Annual Fees**

Domestic Application (a)	Perpetual License (a)	Annual License (b)	Support and Maintenance (c)	License, Support, and Maintenance (d)
CSI eXPRESS				
Automated Renewals Process (ARP)				
Profitability Indicator				
Decision Point				
Commercial Underwriting Workstation (CUW)				
Premium Booking				
Texas Accident Prevention System (TAPS)				
Individual Rate Modification Application (IRMA)				
CIS Claims				
Cornerstone				
Total	\$ 7,940,000	\$ 3,573,000	\$ 786,060	\$ 4,359,060

Note/Source(s):

- (a) Perpetual License includes a Deployment License fee and Development Seat License fee. See **Schedule 6.1**.
- (b) I understand the Annual License Fee is calculated as the Perpetual License Fee multiplied by a conversion factor of [REDACTED] (Waid 1/16/2019 Deposition at 128-129; Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 26-27.)
- (c) I understand the Support and Maintenance Fee is calculated as [REDACTED] (i.e., current rate) of the Annual License Fee. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendants' Interrogatory Nos. 6-9 dated, April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 73-74.)
- (d) Calculated as the sum of the Annual License and Support and Maintenance.

SCHEDULE 6.1

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 6.1: Domestic Application Perpetual License Fee Calculation**

Domestic Application (a)	Size (b)	Fees				Perpetual License (g)
		Deployment License (c)	Multi-Platform Uplift (d)	Adjusted Deployment License (e)	Development Seat Pack (b) License (f)	
CSI eXPRESS						
Automated Renewals Process (ARP)						
Profitability Indicator						
Decision Point						
Commercial Underwriting Workstation (CUW)						
Premium Booking						
Texas Accident Prevention System (TAPS)						
Individual Rate Modification Application (IRMA)						
CIS Claims						
Cornerstone						
Total		\$ 6,250,000		\$ 6,550,000	\$ 1,390,000	\$ 7,940,000

Note/Source(s):

- (a) Fair Isaac Corporation's Second Supplemental Answers to Interrogatory Nos. 2, 3, and 4, dated June 21, 2018 at 8; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019 at 3-19.
- (b) Per discussions with William Waid, I understand the Size of the application is determined based on the nine-factor Application Sizing Matrix. Additionally, I understand a Development Seat, which is priced in Packs, is a required annual cost to help maintain the software. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 17-21.)
- (c) Per discussions with William Waid, I understand the Deployment License fee is determined based on applying the application Size to the Category Matrix Pricing. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid Declaration at Exhibit A (FICO0000830); Waid 4/2/2019 Deposition at 17-21.)
- (d) Per discussions with William Waid, I understand CSI eXPRESS application uses more than one platform and accordingly, a Multi-Platform Uplift fee of [REDACTED] is applied to the Deployment License fee. Additionally, I understand the Packs of Development Seats for CSI eXPRESS (i.e., 3-Pack) is required separately for each platform (i.e., two 3-Packs). All other domestic applications only use one platform. (Waid 4/2/2019 Deposition at 96-97; FED001020_0001.)
- (e) Calculated as the sum of the Deployment License fee and the Multi-Platform Uplift fee.
- (f) Per discussions with William Waid, I understand the Development Seat License fee is determined based on the Category Pricing Matrix. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid Declaration at Exhibit A (FICO0000830).)
- (g) Calculated as the sum of the Adjusted Deployment License fee and Development Seat License fee.

SCHEDULE 7.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 7.0: Foreign Named Application Annual Fees**

Application (a)	Region (a)	Perpetual License (a)	Annual License (b)	Support and Maintenance (c)	License, Support, and Maintenance (d)
ADAPT	Australia				
ADAPT	U.K.				
Evolution	Australia				
Evolution	Canada				
EZER	U.K. and Europe				
Exari	U.K.				
Broker Site	Canada				
Total		\$ 6,015,000	\$ 2,706,750	\$ 595,485	\$ 3,302,235

Note/Source(s):

- (a) Perpetual License Includes a Deployment License Fee and Development Seat License Fee. See **Schedule 6.1**.
- (b) I understand the Annual License Fee is calculated as the Perpetual License Fee multiplied by a conversion factor of [REDACTED]. (Waid 1/16/2019 Deposition at 128-129; Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 26-27.)
- (c) I understand the Support and Maintenance Fee is calculated as [REDACTED] (i.e., current rate) of the Annual License Fee. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendants' Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 73-74.)
- (d) Calculated as the sum of the Annual License and Support and Maintenance.

SCHEDULE 7.1

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 7.1: Foreign Application Perpetual License Fee Calculation**

Application (a)	Region (a)	Size (b)	<i>Fees</i>				
			Deployment License (c)	Multi-Platform	Adjusted Deployment	Development Seat	
				Uplift (d)	License (e)	Pack (h)	License (f)
							Perpetual License (g)
ADAPT	Australia	Large					
ADAPT	U.K.	Large					
Evolution	Australia	Large					
Evolution	Canada	Large					
EZER	U.K. and Europe	Large					
Exari	U.K.	Large					
Broker Site	Canada	Large					
Total			\$ 5,250,000		\$ 5,550,000	\$ 465,000	\$ 6,015,000

Note/Source(s):

- (a) Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 18, dated March 21, 2019 at 3; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 19, dated March 2, 2019 at 3; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 20, dated March 21, 2019 at 3-5.
- (b) Per discussions with William Waid, I understand the Size of the application is determined based on the nine-factor Application Sizing Matrix. Additionally, I understand a Development Seat, which is priced in Packs, is a required annual cost to help maintain the software. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid 4/2/2019 Deposition at 17-21.)
- (c) Per discussions with William Waid, I understand the Deployment License fee is determined based on applying the application Size to the Category Matrix Pricing. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid Declaration at Exhibit A (FICO0000830); Waid 4/2/2019 Deposition at 17-21.)
- (d) Per discussions with William Waid, I understand Evolution (Canada) application uses more than one platform and accordingly, a Multi-Platform Uplift fee of [REDACTED] is applied to the Deployment License fee. Additionally, I understand the Packs of Development Seats for Evolution (Canada) (i.e., 3-Pack) is required separately for each platform (i.e., two 3-Packs). All other foreign applications only use one platform. (Waid 4/2/2019 Deposition at 96-97; FED001311_0001-028 at 020; FED001020_0001.)
- (e) Calculated as the sum of the Deployment License fee and the Multi-Platform Uplift fee.
- (f) Per discussions with William Waid, I understand the Development Seat License fee is determined based on the Category Pricing Matrix. (Plaintiff Fair Isaac Corporation's Second Supplemental Answers to Defendant's Interrogatory Nos. 6-9, dated April 23, 2018 at 6-7; Waid Declaration at Exhibit A (FICO0000830).)
- (g) Calculated as the sum of the Adjusted Deployment License fee and Development Seat License fee.

SCHEDULE 8.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 8.0: Summary of Defendants' Domestic Gross Written Premiums**

<i>March 31, 2016 to March 2019</i>				
Domestic Applications	All Writing Companies (a)	Chubb INA Holdings, Inc. Subsidiaries (b)	Defendants, Subsidiaries and Pooling Entities (c)	Non-Subsidiaries and Non-Pooling Entities (d)
Commercial Underwriting Workstation (CUW)	\$ 21,383,446,632	\$ 21,151,270,694	\$ 21,109,818,196	\$ 41,452,498
CSI eXPRESS (e)	4,325,229,977	4,325,229,977	4,009,182,762	316,047,214
Premium Booking	1,324,107,605	1,324,107,605	1,324,107,605	-
Texas Accident Prevention System (TAPS)	692,382,681	692,382,681	692,382,681	-
Cornerstone	576,117,660	576,117,660	548,732,926	27,384,734
Individual Rate Modification Application (IRMA)	271,875,166	271,869,120	248,022,035	23,847,085
Decision Point	13,162,664	13,162,664	13,113,632	49,032
TOTAL	\$ 28,586,322,385 (f)	\$ 28,354,140,400 (f)	\$ 27,945,359,837	\$ 408,780,563

Note/Source(s):

- (a) See **Schedule 10.1**.
 (b) See **Schedule 10.2**.
 (c) See **Schedule 10.3**.
 (d) Calculated as the difference between (b) and (c).
 (e) I understand the gross written premiums reported for CSI eXPRESS includes premiums related to the Automated Renewals Process and Profitability Indicator applications. Further, CSI eXPRESS, Automated Renewals Process and Profitability Indicator are all used in connection with the same gross written premium policies. (Harkin Deposition at 72-74; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019 at 3-5, 11-13.)
 (f) I understand the difference between All Writing Companies and Chubb INA Holdings, Inc. Subsidiaries primarily relate to gross written premiums reported by Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company for the CUW application. Both Westchester entities are not subsidiaries of Chubb INA Holdings, Inc., however I understand Westchester Fire Insurance Company participated in a pool together with the Defendants in 2018. See **Schedules 13.1 and 16.0**.

SCHEDULE 9.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 9.0: Summary of Defendants' Foreign Gross Written Premiums***April 21, 2013 to March 2019*

Foreign Applications	Region	All Writing Companies (a)	Chubb Corporation and Chubb INA Holdings, Inc. Subsidiaries (b)	Federal, Subsidiaries and Pooling Entities (c)	Non-Subsidiaries and Non-Pooling Entities (d)
ADAPT	Australia	\$ 104,643,020	\$ 104,643,020	\$ 76,090,876	\$ 28,552,143
ADAPT	U.K.	265,034,167	265,034,167	213,529,232	51,504,935
Evolution	Australia	87,984,461	87,984,461	-	87,984,461
Evolution (e)	Canada	1,278,000,000	1,278,000,000	534,000,000	744,000,000
EZER	Europe	786,223,356	786,223,356	672,408,758	113,814,598
EZER	U.K.	15,477	15,477	15,477	-
Broker Site (e)	Canada	n/a	n/a	n/a	n/a
TOTAL		\$ 2,521,900,482	\$ 2,521,900,482	\$ 1,496,044,344	\$ 1,025,856,138

Note/Source(s):

- (a) See **Schedule 11.1**.
 (b) See **Schedule 11.2**.
 (c) See **Schedule 11.3**.
 (d) Calculated as the difference between (b) and (c).
 (e) I understand the Evolution (Canada) and Broker Site (Canada) applications share the same underlying database and therefore report the same gross written premiums. (Harkin Deposition at 206-209.)

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)	
ADAPT (Australia)	Foreign	2013	\$ 26,589,734	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2014	\$ 26,580,572	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2015	\$ 25,345,604	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2016	\$ 22,404,103	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2017	\$ 7,512,511	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2018	\$ 4,049,851	Chubb Insurance Company of Australia Ltd.	
ADAPT (Australia)	Foreign	2019	\$ 186,704	Chubb Insurance Company of Australia Ltd.	
ADAPT (UK)	Foreign	2013	\$ 63,402,809	Chubb Insurance Company of Europe SE	(c)
ADAPT (UK)	Foreign	2014	\$ 60,130,370	Chubb Insurance Company of Europe SE	(c)
ADAPT (UK)	Foreign	2015	\$ 61,438,935	Chubb Insurance Company of Europe SE	(c)
ADAPT (UK)	Foreign	2016	\$ 47,695,132	Chubb Insurance Company of Europe SE	(c)
ADAPT (UK)	Foreign	2017	\$ 40,226,219	Chubb European Group, SE	(c)
ADAPT (UK)	Foreign	2018	\$ 11,278,716	Chubb European Group, SE	(c)
Broker Site (Canada)	Foreign	2015	\$ 303,000,000	Chubb Insurance Company of Canada	
Broker Site (Canada)	Foreign	2016	\$ 308,000,000	Chubb Insurance Company of Canada	
Broker Site (Canada)	Foreign	2017	\$ 330,000,000	Chubb Insurance Company of Canada	
Broker Site (Canada)	Foreign	2018	\$ 337,000,000	Chubb Insurance Company of Canada	
Cornerstone	Domestic	2016	\$ 7,408,108	Chubb Insurance Company of Canada	
Cornerstone	Domestic	2016	\$ -	Federal Insurance Company	
Cornerstone	Domestic	2016	\$ 220,608,093	Federal Insurance Company	
Cornerstone	Domestic	2016	\$ -	Great Northern Insurance Company	
Cornerstone	Domestic	2016	\$ 5,000,954	Pacific Indemnity Company	
Cornerstone	Domestic	2016	\$ 4,419,671	Vigilant Insurance Company	
Cornerstone	Domestic	2017	\$ 11,328,070	Chubb Insurance Company of Canada	
Cornerstone	Domestic	2017	\$ 235,297,734	Federal Insurance Company	
Cornerstone	Domestic	2017	\$ 670	Great Northern Insurance Company	
Cornerstone	Domestic	2017	\$ 9,784,435	Pacific Indemnity Company	
Cornerstone	Domestic	2017	\$ 3,230,203	Vigilant Insurance Company	
Cornerstone	Domestic	2018	\$ 14,657,186	Chubb Insurance Company of Canada	
Cornerstone	Domestic	2018	\$ 116,145,727	Federal Insurance Company	
Cornerstone	Domestic	2018	\$ 1,205	Great Northern Insurance Company	
Cornerstone	Domestic	2018	\$ 4,497,351	Pacific Indemnity Company	
Cornerstone	Domestic	2018	\$ 1,756,697	Vigilant Insurance Company	
CSI eXPRESS	Domestic	2016	\$ 98,911,117	Chubb Insurance Company of Canada	
CSI eXPRESS	Domestic	2016	\$ 2,480,212	Chubb Insurance Company of Canada	
CSI eXPRESS	Domestic	2016	\$ 21,543,943	Chubb Insurance Company of New Jersey	

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
CSI eXPRESS	Domestic	2016	\$ 2,212,095	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2016	\$ 74,655,072	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2016	\$ 492,570	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2016	\$ 31,403,417	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2016	\$ 1,026,440	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2016	\$ 1,210,424,579	Federal Insurance Company
CSI eXPRESS	Domestic	2016	\$ 75,579,124	Federal Insurance Company
CSI eXPRESS	Domestic	2016	\$ 150,747	Pacific Indemnity Company
CSI eXPRESS	Domestic	2016	\$ 206,637	Pacific Indemnity Company
CSI eXPRESS	Domestic	2016	\$ 7,425,581	Vigilant Insurance Company
CSI eXPRESS	Domestic	2017	\$ 99,877,332	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2017	\$ 4,853,321	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2017	\$ 20,940,256	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2017	\$ 2,916,920	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2017	\$ 62,459,327	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2017	\$ 441,481	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2017	\$ 28,856,329	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2017	\$ 1,256,713	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2017	\$ 1,132,709,568	Federal Insurance Company
CSI eXPRESS	Domestic	2017	\$ 101,305,051	Federal Insurance Company
CSI eXPRESS	Domestic	2017	\$ 331,853	Pacific Indemnity Company
CSI eXPRESS	Domestic	2017	\$ 262,033	Pacific Indemnity Company
CSI eXPRESS	Domestic	2017	\$ 6,697,327	Vigilant Insurance Company
CSI eXPRESS	Domestic	2017	\$ 3,346	Vigilant Insurance Company
CSI eXPRESS	Domestic	2018	\$ 3,309,818	Chubb Custom Insurance Company
CSI eXPRESS	Domestic	2018	\$ 1,210,985	Chubb Custom Insurance Company
CSI eXPRESS	Domestic	2018	\$ 92,730,755	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2018	\$ 4,879,760	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2018	\$ 22,833,376	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2018	\$ 3,180,349	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2018	\$ 49,158,127	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2018	\$ 10,429	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2018	\$ 11,370,649	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2018	\$ 1,377,654	Executive Risk Specialty Insurance Company
CSI eXPRESS	Domestic	2018	\$ 1,084,053,467	Federal Insurance Company
CSI eXPRESS	Domestic	2018	\$ 126,368,942	Federal Insurance Company

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
CSI eXPRESS	Domestic	2018	\$ 384,509	Pacific Indemnity Company
CSI eXPRESS	Domestic	2018	\$ 101,678	Pacific Indemnity Company
CSI eXPRESS	Domestic	2018	\$ 5,071,070	Vigilant Insurance Company
CSI eXPRESS	Domestic	2019	\$ 2,618,203	Chubb Custom Insurance Company
CSI eXPRESS	Domestic	2019	\$ 209,354	Chubb Custom Insurance Company
CSI eXPRESS	Domestic	2019	\$ 13,006,700	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2019	\$ 686,641	Chubb Insurance Company of Canada
CSI eXPRESS	Domestic	2019	\$ 6,335,054	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2019	\$ 588,605	Chubb Insurance Company of New Jersey
CSI eXPRESS	Domestic	2019	\$ 11,593,477	Executive Risk Indemnity Inc.
CSI eXPRESS	Domestic	2019	\$ 241,187,027	Federal Insurance Company
CSI eXPRESS	Domestic	2019	\$ 26,215,624	Federal Insurance Company
CSI eXPRESS	Domestic	2019	\$ 105,626	Pacific Indemnity Company
CSI eXPRESS	Domestic	2019	\$ 5,075	Pacific Indemnity Company
CSI eXPRESS	Domestic	2019	\$ 220,288	Vigilant Insurance Company
CSI eXPRESS	Domestic	2019	\$ 2,296	Vigilant Insurance Company
CUW	Domestic	2016	\$ 108,983,074	ACE American Insurance Company
CUW	Domestic	2016	\$ 1,092,991	ACE Fire Underwriters Insurance Company
CUW	Domestic	2016	\$ 106,304,730	ACE Property and Casualty Insurance Company
CUW	Domestic	2016	\$ 217,444,131	Chubb Custom Insurance Company
CUW	Domestic	2016	\$ 41,810	Chubb de Mexico Compania de Seguros, S.A. de C.V.
CUW	Domestic	2016	\$ 515,778,122	Chubb Indemnity Insurance Company
CUW	Domestic	2016	\$ 223,981	Chubb Insurance Australia Limited
CUW	Domestic	2016	\$ 10,686	Chubb Insurance Company Limited
CUW	Domestic	2016	\$ 173,352	Chubb Insurance Company of Canada
CUW	Domestic	2016	\$ 260,360	Chubb European Group, SE
CUW	Domestic	2016	\$ 69,278,561	Chubb Insurance Company of New Jersey
CUW	Domestic	2016	\$ 50,975,438	Chubb National Insurance Company
CUW	Domestic	2016	\$ 4,281	Chubb Seguros Brasil S.A.
CUW	Domestic	2016	\$ 2,167,006	Executive Risk Indemnity Inc.
CUW	Domestic	2016	\$ 4,528,627	Executive Risk Specialty Insurance Company
CUW	Domestic	2016	\$ 4,800,540,559	Federal Insurance Company
CUW	Domestic	2016	\$ 868,809,231	Great Northern Insurance Company
CUW	Domestic	2016	\$ 81,709,115	Illinois Union Insurance Company
CUW	Domestic	2016	\$ 17,014,247	Indemnity Insurance Company of North America
CUW	Domestic	2016	\$ 469,700	Pacific Employers Insurance Company

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
CUW	Domestic	2016	\$ 426,214,814	Pacific Indemnity Company
CUW	Domestic	2016	\$ 307,080,046	Vigilant Insurance Company
CUW	Domestic	2016	\$ 31,266,954	Westchester Fire Insurance Company
CUW	Domestic	2016	\$ 12,587,416	Westchester Surplus Lines Insurance Company
CUW	Domestic	2017	\$ 354,885,927	ACE American Insurance Company
CUW	Domestic	2017	\$ 1,722,590	ACE Fire Underwriters Insurance Company
CUW	Domestic	2017	\$ 248,919,844	ACE Property and Casualty Insurance Company
CUW	Domestic	2017	\$ 125,046,576	Chubb Custom Insurance Company
CUW	Domestic	2017	\$ 12,403	Chubb de Mexico Compania de Seguros, S.A. de C.V.
CUW	Domestic	2017	\$ 368,955	Chubb European Group, SE
CUW	Domestic	2017	\$ 581,425,852	Chubb Indemnity Insurance Company
CUW	Domestic	2017	\$ 5,554	Chubb Insurance Australia Limited
CUW	Domestic	2017	\$ 7,913	Chubb Insurance Company Limited
CUW	Domestic	2017	\$ 14,184	Chubb Insurance Company of Canada
CUW	Domestic	2017	\$ 65,809,698	Chubb Insurance Company of New Jersey
CUW	Domestic	2017	\$ 68,554,767	Chubb National Insurance Company
CUW	Domestic	2017	\$ 16,297	Chubb Seguros Brasil S.A.
CUW	Domestic	2017	\$ 2,732,882	Executive Risk Indemnity Inc.
CUW	Domestic	2017	\$ 1,102,030	Executive Risk Specialty Insurance Company
CUW	Domestic	2017	\$ 5,098,798,285	Federal Insurance Company
CUW	Domestic	2017	\$ 912,720,319	Great Northern Insurance Company
CUW	Domestic	2017	\$ 255,341,641	Illinois Union Insurance Company
CUW	Domestic	2017	\$ 21,351,439	Indemnity Insurance Company of North America
CUW	Domestic	2017	\$ 869,381	Pacific Employers Insurance Company
CUW	Domestic	2017	\$ 468,474,693	Pacific Indemnity Company
CUW	Domestic	2017	\$ 324,338,205	Vigilant Insurance Company
CUW	Domestic	2017	\$ 67,191,783	Westchester Fire Insurance Company
CUW	Domestic	2017	\$ 45,285,709	Westchester Surplus Lines Insurance Company
CUW	Domestic	2018	\$ 274,751,661	ACE American Insurance Company
CUW	Domestic	2018	\$ 1,498,240	ACE Fire Underwriters Insurance Company
CUW	Domestic	2018	\$ 191,070,156	ACE Property and Casualty Insurance Company
CUW	Domestic	2018	\$ 68,563,377	Chubb Custom Insurance Company
CUW	Domestic	2018	\$ 16,435	Chubb de Mexico Compania de Seguros, S.A. de C.V.
CUW	Domestic	2018	\$ 85,623	Chubb European Group, SE
CUW	Domestic	2018	\$ 443,033,892	Chubb Indemnity Insurance Company
CUW	Domestic	2018	\$ 25,208	Chubb Insurance Australia Limited

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
CUW	Domestic	2018	\$ 6,135	Chubb Insurance Company Limited
CUW	Domestic	2018	\$ 6,754	Chubb Insurance Company of Canada
CUW	Domestic	2018	\$ 32,946,513	Chubb Insurance Company of New Jersey
CUW	Domestic	2018	\$ 66,309,955	Chubb National Insurance Company
CUW	Domestic	2018	\$ 642	Chubb Seguros Brasil S.A.
CUW	Domestic	2018	\$ 1,661,561	Executive Risk Indemnity Inc.
CUW	Domestic	2018	\$ 213,165	Executive Risk Specialty Insurance Company
CUW	Domestic	2018	\$ 3,558,748,157	Federal Insurance Company
CUW	Domestic	2018	\$ 710,266,687	Great Northern Insurance Company
CUW	Domestic	2018	\$ 240,820,970	Illinois Union Insurance Company
CUW	Domestic	2018	\$ 13,196,308	Indemnity Insurance Company of North America
CUW	Domestic	2018	\$ 51,084	Pacific Employers Insurance Company
CUW	Domestic	2018	\$ 369,995,206	Pacific Indemnity Company
CUW	Domestic	2018	\$ 227,639,141	Vigilant Insurance Company
CUW	Domestic	2018	\$ 36,242,321	Westchester Fire Insurance Company
CUW	Domestic	2018	\$ 49,388,448	Westchester Surplus Lines Insurance Company
CUW	Domestic	2019	\$ 13,255,599	ACE American Insurance Company
CUW	Domestic	2019	\$ 185,620	ACE Fire Underwriters Insurance Company
CUW	Domestic	2019	\$ 7,502,715	ACE Property and Casualty Insurance Company
CUW	Domestic	2019	\$ 6,693,927	Chubb Custom Insurance Company
CUW	Domestic	2019	\$ 50,083,542	Chubb Indemnity Insurance Company
CUW	Domestic	2019	\$ 2,469,028	Chubb Insurance Company of New Jersey
CUW	Domestic	2019	\$ 6,526,910	Chubb National Insurance Company
CUW	Domestic	2019	\$ 417,370,954	Federal Insurance Company
CUW	Domestic	2019	\$ 97,044,347	Great Northern Insurance Company
CUW	Domestic	2019	\$ 24,843,797	Illinois Union Insurance Company
CUW	Domestic	2019	\$ 66,049	Indemnity Insurance Company of North America
CUW	Domestic	2019	\$ 39,736,490	Pacific Indemnity Company
CUW	Domestic	2019	\$ 25,155,354	Vigilant Insurance Company
CUW	Domestic	2019	\$ 174,830	Westchester Fire Insurance Company
CUW	Domestic	2019	\$ 538,022	Westchester Surplus Lines Insurance Company
Decision Point	Domestic	2016	\$ 182,250	Chubb Insurance Company of New Jersey
Decision Point	Domestic	2016	\$ 5,465	Executive Risk Indemnity Inc.
Decision Point	Domestic	2016	\$ 3,359,894	Federal Insurance Company
Decision Point	Domestic	2017	\$ 319,437	Chubb Insurance Company of New Jersey
Decision Point	Domestic	2017	\$ 34,636	Executive Risk Indemnity Inc.

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)	
Decision Point	Domestic	2017	\$ 3,965,783	Federal Insurance Company	
Decision Point	Domestic	2018	\$ 236,749	Chubb Insurance Company of New Jersey	
Decision Point	Domestic	2018	\$ 34,899	Executive Risk Indemnity Inc.	
Decision Point	Domestic	2018	\$ 4,542,690	Federal Insurance Company	
Decision Point	Domestic	2019	\$ 80,257	Chubb Insurance Company of New Jersey	
Decision Point	Domestic	2019	\$ 14,133	Executive Risk Indemnity Inc.	
Decision Point	Domestic	2019	\$ 1,253,341	Federal Insurance Company	
Evolution (Australia)	Foreign	2017	\$ 992,514	Chubb Insurance Company of Australia Ltd.	
Evolution (Australia)	Foreign	2018	\$ 76,787,952	Chubb Insurance Company of Australia Ltd.	
Evolution (Australia)	Foreign	2019	\$ 10,203,995	Chubb Insurance Company of Australia Ltd.	
Evolution (Canada)	Foreign	2015	\$ 303,000,000	Chubb Insurance Company of Canada	
Evolution (Canada)	Foreign	2016	\$ 308,000,000	Chubb Insurance Company of Canada	
Evolution (Canada)	Foreign	2017	\$ 330,000,000	Chubb Insurance Company of Canada	
Evolution (Canada)	Foreign	2018	\$ 337,000,000	Chubb Insurance Company of Canada	
EZER (Europe)	Foreign	2013	\$ 200,554,401	Chubb Insurance Company of Europe SE	(c)
EZER (Europe)	Foreign	2014	\$ 196,353,338	Chubb Insurance Company of Europe SE	(c)
EZER (Europe)	Foreign	2015	\$ 179,188,308	Chubb Insurance Company of Europe SE	(c)
EZER (Europe)	Foreign	2016	\$ 156,849,666	Chubb Insurance Company of Europe SE	(c)
EZER (Europe)	Foreign	2017	\$ 109,376,325	Chubb European Group, SE	(c)
EZER (Europe)	Foreign	2018	\$ 4,438,273	Chubb European Group, SE	(c)
EZER (UK)	Foreign	2013	\$ -	Federal Insurance Company	(d)
EZER (UK)	Foreign	2014	\$ 7,833	Federal Insurance Company	(d)
EZER (UK)	Foreign	2015	\$ 3,515	Federal Insurance Company	(d)
EZER (UK)	Foreign	2016	\$ 4,130	Federal Insurance Company	(d)
EZER (UK)	Foreign	2017	\$ -	Federal Insurance Company	(d)
EZER (UK)	Foreign	2018	\$ -	Federal Insurance Company	(d)
IRMA	Domestic	2016	\$ 7,252	Albany Insurance Company	
IRMA	Domestic	2016	\$ 615,040	Chubb Custom Insurance Company	
IRMA	Domestic	2016	\$ 19,420	Chubb de Mexico Compania Afianzadora, S.A. de C.V.	(c)
IRMA	Domestic	2016	\$ 5,451	Chubb de Mexico Compania de Seguros, S.A. de C.V.	
IRMA	Domestic	2016	\$ 33,637	Chubb Insurance Australia Limited	
IRMA	Domestic	2016	\$ 3,758	Chubb Insurance Company Limited	
IRMA	Domestic	2016	\$ 10,045,179	Chubb Insurance Company of Canada	
IRMA	Domestic	2016	\$ 1,108,829	Chubb Insurance Company of New Jersey	
IRMA	Domestic	2016	\$ 68,744,411	Federal Insurance Company	
IRMA	Domestic	2016	\$ 17,031,473	Great Northern Insurance Company	

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
IRMA	Domestic	2016	\$ 3,894,125	Pacific Indemnity Company
IRMA	Domestic	2016	\$ 750	Self-Insured Retention
IRMA	Domestic	2016	\$ 3,757,327	Vigilant Insurance Company
IRMA	Domestic	2017	\$ 13,803	Chubb Custom Insurance Company
IRMA	Domestic	2017	\$ 7,175	Chubb de Mexico Compania Afianzadora, S.A. de C.V. (e)
IRMA	Domestic	2017	\$ 4,582	Chubb de Mexico Compania de Seguros, S.A. de C.V.
IRMA	Domestic	2017	\$ 32,575	Chubb European Group, SE
IRMA	Domestic	2017	\$ 10,500	Chubb Insurance Australia Limited
IRMA	Domestic	2017	\$ 15,068	Chubb Insurance Company Limited
IRMA	Domestic	2017	\$ 10,196,153	Chubb Insurance Company of Canada
IRMA	Domestic	2017	\$ 889,740	Chubb Insurance Company of New Jersey
IRMA	Domestic	2017	\$ 66,294,343	Federal Insurance Company
IRMA	Domestic	2017	\$ 16,015,552	Great Northern Insurance Company
IRMA	Domestic	2017	\$ 2,860,463	Pacific Indemnity Company
IRMA	Domestic	2017	\$ 3,348,817	Vigilant Insurance Company
IRMA	Domestic	2018	\$ 4,782	Chubb Custom Insurance Company
IRMA	Domestic	2018	\$ 11,668,247	Chubb Insurance Company of Canada
IRMA	Domestic	2018	\$ 966,870	Chubb Insurance Company of New Jersey
IRMA	Domestic	2018	\$ 59,180,524	Federal Insurance Company
IRMA	Domestic	2018	\$ 15,149,788	Great Northern Insurance Company
IRMA	Domestic	2018	\$ 2,586,050	Pacific Indemnity Company
IRMA	Domestic	2018	\$ 3,085,724	Vigilant Insurance Company
Premium Booking	Domestic	2016	\$ 503,432,073	Federal Insurance Company (f)
Premium Booking	Domestic	2017	\$ 442,839,932	Federal Insurance Company (f)
Premium Booking	Domestic	2018	\$ 500,850,829	Federal Insurance Company (f)
TAPS	Domestic	2016	\$ 73,264,109	Chubb Indemnity Insurance Company
TAPS	Domestic	2016	\$ 561,041	Chubb National Insurance Company
TAPS	Domestic	2016	\$ 143,625,269	Federal Insurance Company
TAPS	Domestic	2016	\$ 8,309,789	Great Northern Insurance Company
TAPS	Domestic	2016	\$ 42,217,710	Pacific Indemnity Company
TAPS	Domestic	2016	\$ 17,102,989	Vigilant Insurance Company
TAPS	Domestic	2017	\$ 45,571,577	Chubb Indemnity Insurance Company
TAPS	Domestic	2017	\$ 1,864,828	Chubb National Insurance Company
TAPS	Domestic	2017	\$ 144,179,732	Federal Insurance Company
TAPS	Domestic	2017	\$ 5,976,054	Great Northern Insurance Company
TAPS	Domestic	2017	\$ 45,768,063	Pacific Indemnity Company

SCHEDULE 12.0

*Fair Isaac Corporation v. Federal Insurance Company and ACE American Insurance Company***SCHEDULE 12.0: Consolidated Gross Written Premium Detail (a)**

Application	Foreign/ Domestic	Year	Gross Written Premium	StoneTurn Writing Company (b)
TAPS	Domestic	2017	\$ 8,858,947	Vigilant Insurance Company
TAPS	Domestic	2018	\$ 39,388,714	Chubb Indemnity Insurance Company
TAPS	Domestic	2018	\$ 5,073,844	Chubb National Insurance Company
TAPS	Domestic	2018	\$ 123,103,492	Federal Insurance Company
TAPS	Domestic	2018	\$ 5,192,985	Great Northern Insurance Company
TAPS	Domestic	2018	\$ 37,960,159	Pacific Indemnity Company
TAPS	Domestic	2018	\$ 5,771,749	Vigilant Insurance Company
TAPS	Domestic	2019	\$ 428,683	Chubb Indemnity Insurance Company
TAPS	Domestic	2019	\$ 27,056	Chubb National Insurance Company
TAPS	Domestic	2019	\$ 5,438,248	Federal Insurance Company
TAPS	Domestic	2019	\$ 1,779,809	Pacific Indemnity Company
TAPS	Domestic	2019	\$ 578,262	Vigilant Insurance Company

Note/Source(s):

- (a) Gross Written Premiums were excluded for years prior to 2016 for domestic applications. Additionally, Gross Written Premiums were excluded for years prior to 2013 for foreign applications. (Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 16 and Sixth Supplemental Answer to Plaintiff's Interrogatory No. 17, dated March 21, 2019 at 3-19; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 18, dated March 21, 2019 at 3; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 19, dated March 2, 2019 at 3; Federal Insurance Company's Fifth Supplemental Answer to Plaintiff's Interrogatory No. 20, dated March 21, 2019 at 3-5.)
- (b) The Writing Company entities were reported inconsistently between the interrogatory responses, and accordingly, the entities have been standardized for purposes of this schedule.
- (c) I understand the writing companies for years 2012-2016 and 2017-2018 was Chubb Insurance Company of Europe SE and Chubb European Group SE, respectively. (Harkin Deposition at 177-178.)
- (d) I understand U.K. Federal Writing Company is the U.K. branch of Federal. (Harkin Deposition at 153-155.)
- (e) Defendants did not provide enough information to identify the writing company. The Writing Company is assumed to be Chubb de Mexico Compania Afianzadora, S.A. de C.V.
- (f) Defendants did not identify a unique writing company for the gross written premiums reported by the Premium Booking application. I understand that Premium Booking application was used by most of the writing companies that are subsidiaries of Federal. (Mirolyuz 1/11/2019 Deposition at 63-64, 80-81.)